VPAT™

Voluntary Product Accessibility Template®

Version 1.3

The purpose of the **Voluntary Product Accessibility Template**, or **VPAT™**, is to assist Federal contracting officials and other buyers in making preliminary assessments regarding the availability of commercial “Electronic and Information Technology” products and services with features that support accessibility. It is assumed and recommended that offers will provide additional contact information to facilitate more detailed inquiries.

The first table of the Template provides a summary view of the Section 508 Standards. The subsequent tables provide more detailed views of each subsection. There are three columns in each table. Column one of the Summary Table describes the subsections of subparts B and C of the Standards. The second column describes the supporting features of the product or refers you to the corresponding detailed table, e.g., “equivalent facilitation." The third column contains any additional remarks and explanations regarding the product. In the subsequent tables, the first column contains the lettered paragraphs of the subsections. The second column describes the supporting features of the product with regard to that paragraph. The third column contains any additional remarks and explanations regarding the product.

Date: 5-22-2015
Name of Product: SafetySkills Elearning Courseware
Contact for more Information (Mike Robertson (mikerobertson@safetyskills.com):

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Section 1194.21 Software Applications and Operating Systems – Detail

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Criteria	Supporting Features	Remarks and explanations
(a) When software is designed to run on a system that has a keyboard, product functions shall be executable from a keyboard where the function itself or the result of performing a function can be discerned textually.	Supported	All navigation and audio controls, transcript access, captioning access, and other functions may be accessed and performed from a keyboard. All questions/answers and other text elements are discoverable by assistive technologies such as screen readers.
(b) Applications shall not disrupt or disable activated features of other products that are identified as accessibility features, where those features are developed and documented according to industry standards. Applications also shall not disrupt or disable activated features of any operating system that are identified as accessibility features where the application programming interface for those accessibility features has been documented by the manufacturer of the operating system and is available to the product developer.	Supported	SafetySkills courseware launches as a discrete Web browser window; it does not affect/impede other applications in any way.
(c) A well-defined on-screen indication of the current focus shall be provided that moves among interactive interface elements as the input focus changes. The focus shall be programmatically exposed so that Assistive Technology can track focus and focus changes.	Supported	When ‘tabbed’ onto or otherwise focused, the ‘play,’ ‘replay,’ ‘cc’ ‘turn on descriptions’ ‘windows options’ and ‘transcript’ buttons are clearly labeled with a popup label. This label also appears when the buttons are moused

		over. The ‘auto scroll’ checkbox and ‘next’ button are highlighted.
(d) Sufficient information about a user interface element including the identity, operation and state of the element shall be available to Assistive Technology. When an image represents a program element, the information conveyed by the image must also be available in text.	Supported	The SafetySkills interface control identity, operation and state are made clear to the sighted through text and graphical cues. The control identity, operation and state are made clear to the non-sighted through tags that are recognizable to Assistive Technologies.
(e) When bitmap images are used to identify controls, status indicators, or other programmatic elements, the meaning assigned to those images shall be consistent throughout an application's performance.	Supported	All SafetySkills controls and indicators are standardized and used throughout its product line.
(f) Textual information shall be provided through operating system functions for displaying text. The minimum information that shall be made available is text content, text input caret location, and text attributes.	Supported	SafetySkills courseware provides AT with access to all textual information (navigation buttons, captions, etc.) as well as a transcript of the courseware’s narrative. Video content does not have embedded text elements unless the same text is present in bullets/transcript/captions that are discoverable by assistive technology.
(g) Applications shall not override user selected contrast and color selections and other individual display attributes.	Supported	SafetySkills courseware does not override user-selected settings in any way.
(h) When animation is displayed, the information shall be displayable in at least one non-animated presentation mode at the option of the user.	Supported	SafetySkills courseware displays its learning concepts through spoken narrative, text transcripts, and bulleted text. Animation is never used as the sole source of

		learning content.
(i) Color coding shall not be used as the only means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.	Supported	SafetySkills design standards and QA/QC documentation prohibit the use of color as the sole means for conveying information.
(j) When a product permits a user to adjust color and contrast settings, a variety of color selections capable of producing a range of contrast levels shall be provided.	Supported	SafetySkills courseware allows the user to adjust color/contrast settings in regard to the closed captioning. The color/contrast settings may be adjusted through the hardware and/or Web browser being used to launch the courseware.
(k) Software shall not use flashing or blinking text, objects, or other elements having a flash or blink frequency greater than 2 Hz and lower than 55 Hz.	Supported	SafetySkills design standards and QA/QC documentation prohibit objects or other elements having a flash or blink frequency greater than 2 Hz and lower than 55 Hz.
(l) When electronic forms are used, the form shall allow people using Assistive Technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues.	Supported	In the rare instance that forms are used in SafetySkills courseware, they are formatted to support Assistive Technology.

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Section 1194.22 Web-based Internet information and applications – Detail

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Criteria	Supporting Features	Remarks and explanations
(a) A text equivalent for every non-text element shall be provided (e.g., via "alt", "longdesc", or in element content).	Supported	SafetySkills courseware features closed captioning, as well as on-screen text bullets that are derived from the courseware narrative/closed captioning. Buttons and other navigation controls are provided with alt tags so that they are discoverable by assistive technology. Animation is never used as the sole source for learning content. However, there are rare instances when introductory or interstitial material may appear in courseware. In these situation, text equivalent or text descriptions

		are provided in the appropriate format.
(b) Equivalent alternatives for any multimedia presentation shall be synchronized with the presentation.	Supported	Analogous textual information is provided for all on-screen graphical content.
(c) Web pages shall be designed so that all information conveyed with color is also available without color, for example from context or markup.	Supported	SafetySkills design standards and QA/QC documentation prohibit the use of color as the sole means for conveying information.
(d) Documents shall be organized so they are readable without requiring an associated style sheet.	Supported	Assistive technology can access all content without requiring a style sheet.
(e) Redundant text links shall be provided for each active region of a server-side image map.	Not applicable	We do not use image maps.
(f) Client-side image maps shall be provided instead of server-side image maps except where the regions cannot be defined with an available geometric shape.	Not applicable	We do not use image maps.
(g) Row and column headers shall be identified for data tables.	Not applicable/Supported	We do not currently use tables. However, in the event that tables were utilized in our courseware, we have the capability to identify row and column headers.
(h) Markup shall be used to associate data cells and header	Supported	We do not currently use

cells for data tables that have two or more logical levels of row or column headers.		tables. However, in the event that tables were utilized in our courseware, we have the capability to use markup to associate data cells and header cells for data tables that have two or more logical levels of row or column headers.
(i) Frames shall be titled with text that facilitates frame identification and navigation	Not supported	Frameset frames are rarely, if ever, used in SafetySkills courseware. I-frames are used to represent slides; the I-frames are titled with text that facilitates frame identification and navigation.
(j) Pages shall be designed to avoid causing the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.	Supported	SafetySkills design standards prohibit elements that flicker with a frequency greater than 2 Hz and lower than 55 Hz.
(k) A text-only page, with equivalent information or functionality, shall be provided to make a web site comply with the provisions of this part, when compliance cannot be accomplished in any other way. The content of the text-only page shall be updated whenever the primary page changes.	Supported	SafetySkills courseware provides a text transcript of all learning content; this transcript is available by default, but may be toggled ‘off’ at will.

(l) When pages utilize scripting languages to display content, or to create interface elements, the information provided by the script shall be identified with functional text that can be read by Assistive Technology.	Supported	SafetySkills courseware allows access by AT for the navigation controls and other relevant elements that are displayed using information provided by scripting languages.
(m) When a web page requires that an applet, plug-in or other application be present on the client system to interpret page content, the page must provide a link to a plug-in or applet that complies with §1194.21(a) through (l).	Not applicable	SafetySkills courseware does not require plugins or applications other than a Web browser to function.
(n) When electronic forms are designed to be completed on-line, the form shall allow people using Assistive Technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues.	Supported	SafetySkills courseware utilizes forms to create quiz/test content. These quizzes/tests are built to allow assistive technology access, as well as completion via keyboard/alternate means.
(o) A method shall be provided that permits users to skip repetitive navigation links.	Not applicable	SafeySkills courseware does not contain traditional web page navigation.
(p) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	Not applicable	Learners may answer questions/interact with SafetySkills training products without time constraints.

Note to 1194.22: The Board interprets paragraphs (a) through (k) of this section as consistent with the following priority 1 Checkpoints of the Web Content Accessibility Guidelines 1.0 (WCAG 1.0) (May 5 1999) published by the Web Accessibility Initiative of the World Wide Web Consortium: Paragraph (a) - 1.1, (b) - 1.4, (c) - 2.1, (d) - 6.1, (e) - 1.2, (f) - 9.1, (g) - 5.1, (h) - 5.2, (i) - 12.1, (j) - 7.1, (k) - 11.4.

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Section 1194.23 Telecommunications Products – Detail

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Criteria	Supporting Features	Remarks and explanations
(a) Telecommunications products or systems which provide a function allowing voice communication and which do not themselves provide a TTY functionality shall provide a standard non-acoustic connection point for TTYs. Microphones shall be capable of being turned on and off to allow the user to intermix speech with TTY use.	Not applicable	SafetySkills does not produce telecommunications products.

(b) Telecommunications products which include voice communication functionality shall support all commonly used cross-manufacturer non-proprietary standard TTY signal protocols.	Not applicable	SafetySkills does not produce telecommunications products.
(c) Voice mail, auto-attendant, and interactive voice response telecommunications systems shall be usable by TTY users with their TTYs.	Not applicable	SafetySkills does not produce telecommunications products.
(d) Voice mail, messaging, auto-attendant, and interactive voice response telecommunications systems that require a response from a user within a time interval, shall give an alert when the time interval is about to run out, and shall provide sufficient time for the user to indicate more time is required.	Not applicable	SafetySkills does not produce telecommunications products.
(e) Where provided, caller identification and similar telecommunications functions shall also be available for users of TTYs, and for users who cannot see displays.	Not applicable	SafetySkills does not produce telecommunications products.
(f) For transmitted voice signals, telecommunications products shall provide a gain adjustable up to a minimum of 20 dB. For incremental volume control, at least one intermediate step of 12 dB of gain shall be provided.	Not applicable	SafetySkills does not produce telecommunications products.
(g) If the telecommunications product allows a user to adjust the receive volume, a function shall be provided to automatically reset the volume to the default level after every use.	Not applicable	SafetySkills does not produce telecommunications products.
(h) Where a telecommunications product delivers output by an audio transducer which is normally held up to the ear, a	Not applicable	SafetySkills does not produce telecommunications products.

means for effective magnetic wireless coupling to hearing technologies shall be provided.		
(i) Interference to hearing technologies (including hearing aids, cochlear implants, and assistive listening devices) shall be reduced to the lowest possible level that allows a user of hearing technologies to utilize the telecommunications product.	Not applicable	SafetySkills does not produce telecommunications products.
(j) Products that transmit or conduct information or communication, shall pass through cross-manufacturer, non-proprietary, industry-standard codes, translation protocols, formats or other information necessary to provide the information or communication in a usable format. Technologies which use encoding, signal compression, format transformation, or similar techniques shall not remove information needed for access or shall restore it upon delivery.	Not applicable	SafetySkills does not produce telecommunications products.
(k)(1) Products which have mechanically operated controls or keys shall comply with the following: Controls and Keys shall be tactilely discernible without activating the controls or keys.	Not applicable	SafetySkills does not produce telecommunications products.
(k)(2) Products which have mechanically operated controls or keys shall comply with the following: Controls and Keys shall be operable with one hand and shall not require tight grasping, pinching, twisting of the wrist. The force required to activate controls and keys shall be 5 lbs. (22.2N) maximum.	Not applicable	SafetySkills does not produce telecommunications products.
(k)(3) Products which have	Not applicable	SafetySkills does

mechanically operated controls or keys shall comply with the following: If key repeat is supported, the delay before repeat shall be adjustable to at least 2 seconds. Key repeat rate shall be adjustable to 2 seconds per character.		not produce telecommunications products.
(k)(4) Products which have mechanically operated controls or keys shall comply with the following: The status of all locking or toggle controls or keys shall be visually discernible, and discernible either through touch or sound.	Not applicable	SafetySkills does not produce telecommunications products.

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Section 1194.24 Video and Multi-media Products – Detail

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Criteria	Supporting Features	Remarks and explanations
a) All analog television displays 13 inches and larger, and computer equipment that includes analog television receiver or display circuitry, shall be equipped with caption decoder circuitry which appropriately receives, decodes, and displays closed captions from broadcast, cable,	Not applicable	SafetySkills does not manufacture televisions or other types of hardware.

videotape, and DVD signals. As soon as practicable, but not later than July 1, 2002, widescreen digital television (DTV) displays measuring at least 7.8 inches vertically, DTV sets with conventional displays measuring at least 13 inches vertically, and stand-alone DTV tuners, whether or not they are marketed with display screens, and computer equipment that includes DTV receiver or display circuitry, shall be equipped with caption decoder circuitry which appropriately receives, decodes, and displays closed captions from broadcast, cable, videotape, and DVD signals.		
(b) Television tuners, including tuner cards for use in computers, shall be equipped with secondary audio program playback circuitry.	Not applicable	SafetySkills does not produce hardware.
(c) All training and informational video and multimedia productions which support the agency's mission, regardless of format, that contain speech or other audio information necessary for the comprehension of the content, shall be open or closed captioned.	Supported	SafetySkills courseware provides closed captioning which is timed to each course’s spoken narrative. Learners are also provided with a transcript of the spoken narrative.
(d) All training and	Supported	SafetySkills courseware

informational video and multimedia productions which support the agency's mission, regardless of format, that contain visual information necessary for the comprehension of the content, shall be audio described.		features closed captioning, as well as on-screen text bullets that are derived from the courseware narrative/closed captioning. Animation is never used as the sole source for learning content. However, there are rare instances when introductory or interstitial material may appear in courseware. In these situation, text equivalent or text descriptions are provided in the appropriate format.
(e) Display or presentation of alternate text presentation or audio descriptions shall be user-selectable unless permanent.	Supported	The SafetySkills course interface allows users to toggle on/off the closed captioning and transcript at will, and allows muting of audio content throughout.

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Section 1194.25 Self-Contained, Closed Products – Detail

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Criteria	Support	Remarks and explanations

	ting Features	
(a) Self contained products shall be usable by people with disabilities without requiring an end-user to attach Assistive Technology to the product. Personal headsets for private listening are not Assistive Technology.	Not applicable	SafetySkills courseware is not a self-contained product; it is a Web-based software that relies on appropriate hardware (a computer meeting minimum hardware requirements as found in the SafetySkills minimum hardware requirements: https://safetyskills.uservoice.com/knowledgebase/articles/708237-does-the-system-operate-on-all-windows-and-mac-bro
(b) When a timed response is required, the user shall be alerted and given sufficient time to indicate more time is required.	Not applicable	Learners may answer questions/interact with SafetySkills training products without time constraints.
(c) Where a product utilizes touchscreens or contact-sensitive controls, an input method shall be provided that complies with §1194.23 (k) (1) through (4).	Not supported	SafetySkills courseware is designed to function on mobile devices, which typically utilize touch screens to facilitate courseware control. However, we are not aware of any technology that will allow learners to tactilely understand where the course control buttons are without activating said controls.
(d) When biometric forms of user identification or control are used, an alternative form of identification or activation, which does not require the user to possess particular biological characteristics, shall also be provided.	Not applicable	SafetySkills does not employ biometric forms of user identification for its products.

(e) When products provide auditory output, the audio signal shall be provided at a standard signal level through an industry standard connector that will allow for private listening. The product must provide the ability to interrupt, pause, and restart the audio at anytime.	Supported	This requirement will depend somewhat on the hardware used to deliver SafetySkills courseware, but the courseware does supply user hardware with a standard audio signal level, as well as the ability to interrupt, pause and restart the audio at any time.
(f) When products deliver voice output in a public area, incremental volume control shall be provided with output amplification up to a level of at least 65 dB. Where the ambient noise level of the environment is above 45 dB, a volume gain of at least 20 dB above the ambient level shall be user selectable. A function shall be provided to automatically reset the volume to the default level after every use.	Not applicable	SafetySkills courseware is not designed to deliver voice output in a public area.
(g) Color coding shall not be used as the only means of conveying information, indicating an action, prompting a response, or distinguishing a visual element.	Supported	SafetySkills courseware design policies and QA/QC procedures prohibit the use of color coding as the only means of conveying information.
(h) When a product permits a user to adjust color and contrast settings, a range of color selections capable of producing a variety of contrast levels shall be provided.	Not applicable	SafetySkills courseware is not designed to allow users to adjust color and contrast settings.
(i) Products shall be designed to avoid causing the screen to flicker with a frequency greater than 2	Not applicable	SafetySkills courseware design and QA/QC policies and procedures prohibit elements that cause the screen to flicker with a frequency greater than 2 Hz and lower than 55 Hz.

Hz and lower than 55 Hz.		
(j) (1) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: The position of any operable control shall be determined with respect to a vertical plane, which is 48 inches in length, centered on the operable control, and at the maximum protrusion of the product within the 48 inch length on products which are freestanding, non-portable, and intended to be used in one location and which have operable controls.	Not applicable	SafetySkills courseware is designed to be portable, and used on a range of devices.
(j)(2) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: Where any operable control is 10 inches or less behind the reference plane, the height shall be 54 inches maximum and 15 inches minimum above the floor.	Not applicable	SafetySkills courseware is designed to be portable, and used on a range of devices.
(j)(3) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: Where any operable control is more than 10 inches and not more than 24 inches behind	Not applicable	SafetySkills courseware is designed to be portable, and used on a range of devices.

the reference plane, the height shall be 46 inches maximum and 15 inches minimum above the floor.		
(j)(4) Products which are freestanding, non-portable, and intended to be used in one location and which have operable controls shall comply with the following: Operable controls shall not be more than 24 inches behind the reference plane.	Not applicable	SafetySkills courseware is designed to be portable, and used on a range of devices.

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Section 1194.26 Desktop and Portable Computers – Detail

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Criteria	Supporting Features	Remarks and explanations
(a) All mechanically operated controls and keys shall comply with §1194.23 (k) (1) through (4).	Not applicable	SafetySkills produces software which functions on supported Web browsers on a range of supported devices.
(b) If a product utilizes touchscreens or touch-operated controls, an input method shall be provided that complies with §1194.23 (k) (1) through (4).	Not applicable	SafetySkills produces software which functions on supported Web browsers on a range of supported devices.
(c) When biometric forms of user identification or control are used, an alternative form of identification or activation, which does not require the user to possess particular biological characteristics, shall also be provided.	Not applicable	SafetySkills does not utilize biometric forms of user identification or control.
(d) Where provided, at least one of each type of expansion slots, ports and connectors shall comply with publicly available industry standards	Not applicable	SafetySkills produces software which functions on supported Web browsers on a range of supported devices.

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Section 1194.31 Functional Performance Criteria – Detail

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Criteria	Supporting Features	Remarks and explanations
(a) At least one mode of operation and information retrieval that does not require user vision shall be provided, or support for Assistive Technology used by people who are blind or visually impaired shall be provided.	Supported	SafetySkills courseware provides learners with audio, as well captioning and transcripts. All text elements, including course controls, are accessible by assistive technology such as screen readers.
(b) At least one mode of operation and information retrieval that does not require visual acuity greater than 20/70 shall be provided in audio and enlarged print output working together or independently, or support for Assistive Technology used by people who are visually impaired shall be provided.	Supported	SafetySkills courseware provides learners with audio, as well captioning and transcripts. All text elements, including course controls, are accessible by assistive technology such as screen readers. Furthermore, closed captioning, text bullets, transcripts and other on-screen textual and graphical contents can be increased in size through browser view adjustments.
(c) At least one mode of operation and information retrieval that does not	Supported	SafetySkills courseware includes all relevant information in a visual

require user hearing shall be provided, or support for Assistive Technology used by people who are deaf or hard of hearing shall be provided		format, including closed captioning timed with the audible narrative, as well as a full transcript of all learning material. There are also text bullets on each frame of the courseware related to the audible narrative.
(d) Where audio information is important for the use of a product, at least one mode of operation and information retrieval shall be provided in an enhanced auditory fashion, or support for assistive hearing devices shall be provided.	Supported	SafetySkills courseware contains audible narration, which is professionally recorded. The audio engineer normalizes the audio at a volume of 85 – 90 dB, with a signal-to-noise ratio of -1 to -2 dB of gain. This provides the user with a wide range of volume dynamics, with low signal-to-noise ratio. It is expected that the hardware being used to deliver the courseware will have the capability of increasing/decreasing the volume to the desired level.
(e) At least one mode of operation and information retrieval that does not require user speech shall be provided, or support for Assistive Technology used by people with disabilities shall be provided.	Supported/Not applicable	SafetySkills courseware does not require user speech in any way.
(f) At least one mode of operation and information retrieval that does not require fine motor control or simultaneous actions	Supported	SafetySkills courseware can be navigated through single-stroke keyboard commands (i.e. Tab, space bar, right/left

and that is operable with limited reach and strength shall be provided.		arrow), as well as with simple mouse clicks.

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Section 1194.41 Information, Documentation and Support – Detail

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Criteria	Supporting Features	Remarks and explanations
(a) Product support documentation provided to end-users shall be made available in alternate formats upon request, at no additional charge	Supported	SafetySkills courseware product support documentation is currently available in text and video (with audio) formats. However, support contact is readily available, and any reasonable alternate requests for documentation formatting or support will be supplied: https://safetyskills.uservoice.com/
(b) End-users shall have access to a description of the accessibility and compatibility features of products in alternate formats or alternate methods upon request, at no additional charge.	Supported	SafetySkills courseware describes accessibility and compatibility features at the beginning of each course offering. However, support contact is readily available, and any reasonable alternate requests for documentation formatting or support will be supplied.
(c) Support services for products shall accommodate the	Supported	SafetySkills support offers communication through telephone (voice), text chat

communication needs of end-users with disabilities.		(visual), and email (visual). In addition, support personnel routinely perform screen-sharing with learners to provide the maximum amount of explanation required.

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